

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS**

SAROYA ROBERSON, et al., individually)	
And on behalf of all others similarly situated,)	
)	
Plaintiff,)	
)	Case No. 3:20-cv-895
v.)	
)	
MAESTRO CONSULTING SERVICES,)	
LLC, Individually and d/b/a SYMPHONY)	
POST ACUTE NETWORK, et al.)	
)	
Defendants.)	

**PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION
TO DEFENDANT SYMPHONY BEVERLY, LLC**

REQUEST NO. 1: Admit that Exhibit 1 attached hereto is a true and accurate copy of the Symphony of Beverly 2015 State of Illinois Department of Healthcare and Family Services Financial and Statistical Report (Cost Report) for Long Term Care Facilities.

RESPONSE:

REQUEST NO. 2: Admit that Exhibit 1 references Maestro Consulting Services as a “related organization” to Symphony of Beverly during 2015.

RESPONSE:

REQUEST NO. 3: Admit that Exhibit 1 indicates that Maestro Consulting Services provided \$123,404 in consulting services to or for Symphony of Beverly for 2015.

RESPONSE:

REQUEST NO. 4: Admit that Exhibit 1, page 20 (“Page 6-Supplemental”) is a true and accurate itemization and listing of all “related parties”, including related “owners”, “nursing homes”, and “other related business entities”, to Symphony of Beverly during 2015.

RESPONSE:

REQUEST NO. 5: Admit that Exhibit 2 attached hereto is a true and accurate copy of the Symphony at 87th Street 2016 State of Illinois Department of Healthcare and Family Services Financial and Statistical Report (Cost Report) for Long Term Care Facilities.

RESPONSE:

REQUEST NO. 6: Admit that Exhibit 2 references Maestro Consulting Services as a “related organization” to Symphony at 87th Street during 2016.

RESPONSE:

REQUEST NO. 7: Admit that Exhibit 2 indicates that Maestro Consulting Services provided \$648,261 in consulting services to or for Symphony at 87th Street for 2016.

RESPONSE:

REQUEST NO. 8: Admit that Exhibit 2, page 20 (“Page 6-Supplemental”) is a true and accurate itemization and listing of all “related parties”, including related “owners”, “nursing homes”, and “other related business entities”, to Symphony at 87th Street during 2016.

RESPONSE:

REQUEST NO. 9: Admit that Exhibit 3 attached hereto is a true and accurate copy of the Symphony at 87th Street 2017 State of Illinois Department of Healthcare and Family Services Financial and Statistical Report (Cost Report) for Long Term Care Facilities.

RESPONSE:

REQUEST NO. 10: Admit that Exhibit 3 references Maestro Consulting Services as a “related organization” to Symphony at 87th Street during 2017.

RESPONSE:

REQUEST NO. 11: Admit that Exhibit 3 indicates that Maestro Consulting Services provided \$624,606 in consulting services to or for Symphony at 87th Street for 2017.

RESPONSE:

REQUEST NO. 12: Admit that Exhibit 3, page 20 (“Page 6-Supplemental”) is a true and accurate itemization and listing of all “related parties”, including related “owners”, “nursing homes”, and “other related business entities”, to Symphony at 87th Street during 2017.

RESPONSE:

REQUEST NO. 13: Admit that Exhibit 4 attached hereto is a true and accurate copy of the Symphony at 87th Street 2018 State of Illinois Department of Healthcare and Family Services Financial and Statistical Report (Cost Report) for Long Term Care Facilities.

RESPONSE:

REQUEST NO. 14: Admit that Exhibit 4 references Maestro Consulting Services as a “related organization” to Symphony at 87th Street during 2018.

RESPONSE:

REQUEST NO. 15: Admit that Exhibit 4 indicates that Maestro Consulting Services provided \$492,359 in consulting services to or for Symphony at 87th Street for 2018.

RESPONSE:

REQUEST NO. 16: Admit that Exhibit 4, page 12 (“Page 6-Supplemental”) is a true and accurate itemization and listing of all “related parties”, including related “owners”, “nursing homes”, and “other related business entities”, to Symphony at 87th Street during 2018.

RESPONSE:

REQUEST NO. 17: Admit that SYC 000368-000370 is the first occasion your facility received any sort of notification concerning the requirements of the Illinois Biometric Information Privacy Act.

RESPONSE:

REQUEST NO. 18: Admit that SYC 000368-000370 is the first occasion your facility received any sort of notification from Scott Norton or other members of the Symphony Post Acute Network concerning the requirements of the Illinois Biometric Information Privacy Act.

RESPONSE:

REQUEST NO. 19: Admit that your facility did not have or establish any sort of Policy for Retention and Destruction of Biometrics (as described and shown in SYC 000368-000370) until after 9-17-2017.

RESPONSE:

REQUEST NO. 20: Admit that your facility did not receive any Written Releases (as described and shown in SYC 000368-000370) until after 9-17-2017.

RESPONSE:

Dated: January 20, 2021

Respectfully Submitted,

THE DRISCOLL FIRM, P.C.

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 20, 2021, the foregoing document was electronically filed with the Clerk of Court to be served by operation of the Court's CM/ECF system upon all counsel of record.

/s/ Paul W. Johnson